

34 pg.



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SAFE SECTION

July 12, 1991

VIA FEDERAL EXPRESS

United States EPA, Region VII
Dianna L. Newman
Superfund Branch
726 Minnesota Avenue
Kansas City, Kansas 66101

07/14
Site: West Lakes LDF
ID #: MODD79900932
Break: 11.6
Other: Laidlaw Waste
Systems Inc 7-12-91

RE: CERCLA Section 104(e) Information Requests to Laidlaw Waste Systems (Bridgeton) Inc., Laidlaw Waste Systems Inc., and West Lake Landfill, Inc.

Dear Ms. Newman:

This letter is in response to the U.S. Environmental Protection Agency's requests for information as included in its letters dated May 14, 1991 relating, initially, to the West Lake Landfill in Bridgeton, Missouri ("the site"). The definition of the site was modified, however, and, as stated in the June 12, 1991 letter from David A. Hoefer, Assistant Regional Counsel, USEPA to William R. Cottick of Laidlaw Inc., the definition of "the site" for purposes of our responses includes "not only those areas within the geographical boundaries set forth in the Information Request where radioactive materials may be found, but also includes any areas within such boundaries where hazardous substances, hazardous wastes, solid wastes, pollutants and contaminants . . . may be found." Our responses, therefore, are prepared with this modified definition of the site as the parameters.

Laidlaw Waste Systems Inc. purchased all the shares of stock in West Lake Landfill, Inc. in July, 1988. In October, 1988 West Lake Landfill, Inc. changed its legal name to Laidlaw Waste Systems (Bridgeton) Inc. Thus, the Information Requests sent to West Lake Landfill, Inc. and Laidlaw Waste Systems (Bridgeton) Inc. will be answered jointly.

In responding to these Information Requests, we do not acquiesce in any characterization of any material associated with Laidlaw at the site as hazardous materials or substances under any applicable hazardous waste regulations or statutes. We also object to the overly-broad scope of the questions included in the EPA's information requests. Thus, while we are responding to EPA's request in a spirit of cooperation and providing some information concerning the nature of substances at the site, Laidlaw reserves all rights to challenge any allegation of liability imposed on it under CERCLA, RCRA or other statutes; and at the same time, Laidlaw does not waive any objections to the factual assertions included in the EPA's letter or the scope of information requested.

669 AIRPORT FREEWAY, SUITE 400, HURST, TEXAS 76053 (817) 282-7580



40055042
SUPERFUND RECORDS



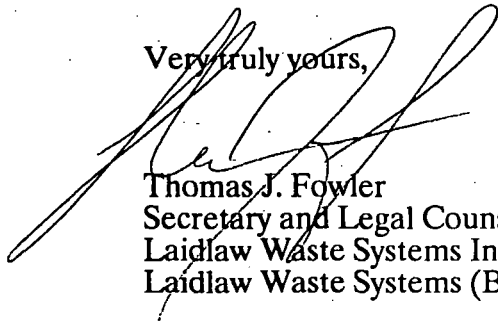
LAI 0006

Dianna L. Newman
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Although Laidlaw has performed a diligent search of the records it considered likely to contain information relating to EPA's request, and similarly has interviewed those employees it considered likely to provide such information, the Company cannot affirm without reservation that it has not inadvertently overlooked some piece of information that might be responsive to the requests, as modified, although substantial documentation does accompany our responses to these requests. Accordingly, the Company reserves the right to supplement, modify, or correct the responses provided herein should additional information become available.

This submission is made without any admission of liability and without prejudice to any position that the Company may take, now or in the future, in connection with this site.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Thomas J. Fowler', is written over the typed name and title.

Thomas J. Fowler
Secretary and Legal Counsel
Laidlaw Waste Systems Inc.
Laidlaw Waste Systems (Bridgeton) Inc.

TJF/pk

This response is on behalf of Laidlaw Waste Systems, Inc. and Laidlaw Waste Systems (Bridgeton), Inc. (formerly West Lake Landfill) and includes the responses attached hereto and the documents accompanying the response.

1. Identify each person who assisted, or is assisting in the preparation of the answers to this request for information.

William Reed
Technical Services Representative
Laidlaw Waste Systems, Inc.
2340 S. Arlington Heights Road, Suite 230
Arlington Heights, IL 60005

Joseph A. Durako
Division Manager Trainee
Laidlaw Waste Systems, Inc.
2340 S. Arlington Heights Road, Suite 230
Arlington Heights, IL 60005

Dennis P. Wike
Assistant Regional Engineer
Laidlaw Waste Systems, Inc.
2340 S. Arlington Heights Road, Suite 230
Arlington Heights, IL 60005

Thomas J. Fowler
Secretary and Legal Counsel
Laidlaw Waste Systems, Inc.
and
Laidlaw Waste Systems (Bridgeton), Mo., Inc.
669 Airport Freeway, Suite 400
Hurst, Texas 76053

2. Identify, if not you, the official or representative of Respondent to contact regarding the requested information.

Jerome T. Wolf
Sandra L. Schermerhorn
Spencer Fane Britt & Browne
1400 Commerce Bank Building
1000 Walnut Street
Kansas City, Missouri 64106

3. Please provide the following information:
- 3.1 The full and correct name of Respondent;
 - 3.2 The date of its incorporation or formation;
 - 3.3 The state of its incorporation or formation;
 - 3.4 The nature of its business;
 - 3.5 Respondent's principal place of business; and
 - 3.6 Names and addresses of Respondents' officers and directors.

Response:

- 3.1 Laidlaw Waste Systems, Inc.
 - 3.2 August 14, 1972
 - 3.3 Delaware
 - 3.4 Waste collection, transportation, treatment, recycling and disposal services
 - 3.5 Executive offices: Burlington, Ontario, Canada
 - 3.6 Directors: Donald K. Jackson; Officers: Donald K. Jackson, President; Charles Leonard, Senior V.P.; Richard A. Norris, V.P., Accounting & Senior Controller; Derek Cathcart, V.P., Pacific Region; Richard McEwen, V.P., Atlantic; Dean DeCourcy, V.P., Central; Ronald Poland, V.P., Environmental Management; Ronald Priest, V.P., Maintenance and Purchasing; Stephen Milford, V.P., Corporate Development; Gregory Peterson, V.P., Sales and Marketing; Michael Brophy, V.P., Human Resources; Dick van Wyck, Secretary; Thomas Fowler, Assistant Secretary.
-
- 3.1 Laidlaw Waste Systems (Bridgeton), Inc. (on October 17, 1988 West Lake Landfill, Inc. changed its name to Laidlaw Waste Systems (Bridgeton), Inc.)
 - 3.2 February 16, 1962
 - 3.3 Missouri
 - 3.4 Sanitary landfill
 - 3.5 Bridgeton, Missouri

3.6 Directors: Michael G. DeGnoote and Leslie W. Haworth;
Officers: Nigel G. H. Guilford, President; Leslie W. Haworth, Vice-President, Finance; Richard A. Norris, V.P., Accounting and Senior Controller; Richard J. Poland, V.P., Environmental Management; Ronald A. Priest, V.P., Maintenance and Purchasing; Charles E. Leonard, V.P., Continental Region; Ivan R. Cairns, Secretary; Thomas J. Fowler, Assistant Secretary; Robert Arquilla, Assistant Secretary.

4. If Respondent has any subsidiaries or affiliates, please state the following with respect to each subsidiary or affiliate:
- 4.1 The full and correct name of each;
 - 4.2 The address of its principal place of business;
 - 4.3 If a corporation, the state of its incorporation;
 - 4.4 Its relationship to Respondent's business or corporation;
 - 4.5 The name, address, and title of each officer and director;
 - 4.6 The name and address of the resident agent; and
 - 4.7 The principal business in which such entity is involved.

Response:

4.1 - 4.7 Included with this response is a copy of Form 22 to the 10K filing of Laidlaw, Inc. which gives a description of the subsidiaries of Laidlaw, Inc.

5. If Respondent is a subsidiary of, a division of, a franchise of, or part of the organization of any other corporation, entity or organization, please state the following with regard to each such corporation, entity or organization:

- 5.1 Its relationship to Respondent's entity, organization or corporation;
- 5.2 Its principal office;
- 5.3 The state of its incorporation or organization;
- 5.4 The date of its incorporation or organization;
- 5.5 Its principal business;
- 5.6 The commencement date of its relationship with Respondent's entity, organization or corporation; and
- 5.7 The names and addresses of its officer and directors.

Response:

- 5.1 Laidlaw Waste Systems, Inc. is a subsidiary of Laidlaw Industries, Inc. which in turn is a subsidiary of Laidlaw, Inc.
- 5.2 Burlington, Ontario, Canada
- 5.3 Delaware
- 5.4 1959
- 5.5 Waste collection, transportation, treatment, recycling and disposal services; school and special education bus service.
- 5.6 1972
- 5.7 Directors: Peter N. T. Widdrington, Donald K. Jackson, Michael A. Ashcroft; William P. Cooper; Michael G. DeGroote; Ronald K. Gamey; Donald M. Green, C.M.; James F. Hankinson, Ralph J. Sazio, and William W. Stinson. Officers: Chairman of the Board, Peter N. T. Widdrington; President and CEO, Donald K. Jackson; Senior Vice-President and General Counsel, Ivan R. Cairns; Senior V.P. and Chief Financial Officer, Leslie W. Hawroth; V.P., Risk Management, Jeffery Cassell; Secretary, William R. Cottick; V.P., Information Systems, Peter W. Hallsworth; V.P., Corporate Development, Richard G. Smith; V.P., Communications Thomas A. G. Watson; and V.P., Controller, Victor A. Wells. The executive offices' address is 3221 North Service Road, P.O. Box 5028, Burlington, Ontario L7R 3Y8.

5.1 Laidlaw Waste Systems (Bridgeton), Inc. is a wholly-owned subsidiary of Laidlaw Waste Systems Holdings, Inc., a Delaware corporation, which in turn is a wholly-owned subsidiary of Laidlaw Waste Systems, Inc., a Delaware corporation.

5.2 Burlington, Ontario, Canada

5.3 Delaware

5.4 1972

5.5 Waste collection

5.6 1988

6. Provide the date quarry operations first began at the West Lake Landfill site. Also provide the date when waste was initially disposed of in the landfill.

A permit for a sanitary landfill at the site was approved by the St. Louis County Council on April 23, 1952, and issued to V. R. Cruse and L. E. Trump on April 29, 1952. Quarry operations predate the landfill operation, but these Respondents have no information on the quarry operations.

7. Provide information and copies of documents pertaining to the ownership of the West Lake Landfill since it began operations as a quarry and as a landfill.

Prior to July 29, 1988, the ownership of West Lake Landfill, Inc. and use of its real property is described on pages 1 and 2 of the Agreement included herein as Attachment 1. The colorized map of the real property is included as Attachment 2.

By the purchase of the stock of West Lake Landfill, Inc. under the Agreement, Laidlaw Waste Systems, Inc. obtained the real property delineated in blue on Attachment 2, except for those areas in red cross-hatch, which were expressly excluded. See paragraph 8 of Attachment 1 and Exhibit F thereto. Prior to the closing of the transaction, West Lake Landfill, Inc. by general warranty deed conveyed its interest in those areas to Rock Road Industries, Inc.

8. Provide details of the relationship(s) between West Lake Landfill, Inc., Rock Road Industries, Inc., West Lake Quarry and Material Company, West Lake Ready Mix Company, Red Bird Ready Mix Company, Laidlaw Waste Systems (Bridgeton), Inc., Laidlaw Waste Systems, Inc., the Archdiocese of St. Louis, the Shrine of St. Jude, and the Society for the Propagation of Faith.

See Attachment 1, Agreement Among Laidlaw Waste Systems, Inc. and Laidlaw Industries, Inc. - West Lake Landfill, Inc., West Lake Quarry and Material Company and West Lake Ready Mix Co. -and John L. May Archbishop of St. Louis, St. Jude League, and the Society for the Propagation of the Faith, Archdiocese of St. Louis.

Laidlaw Waste Systems, Inc. purchased all the shares of stock of West Lake Landfill in July, 1988. In October, 1988, West Lake Landfill, Inc. changed its legal name to Laidlaw Waste Systems (Bridgeton), Inc.

9. Provide maps of the property encompassing the active and inactive quarry and landfill. Describe any adjacent property owned by Respondent, including a legal description.

Please see Attachment 2, a colorized map of the property. In addition, several other maps are collated under Tab 9, and provided with this response.

Property adjacent to the property encompassing the active and inactive quarry and landfill owned by Laidlaw is legally described as follows:

PARCEL 1
1.11 ACRES

Part of U.S. Survey 131 in Township 47 North, Range 5 East of the Fifth Principal Meridian, St. Louis County, Missouri, being more particularly described as follows:

Beginning at the most western corner of a triangular parcel of land, taken for right of way purposes, in Condemnation Suit No. 128048, at the intersection of the southeast line of Taussig Road (as widened), and the southwest line of Highway 40-61 (St. Charles Rock Road); thence South 73 degrees 56 minutes 55 seconds East, along the south line of said parcel, 56.51 feet to the southwesterly right of way line of said Highway 40-61; thence South 37 degrees 11 minutes 39 seconds East, along said right of way, 199.40 feet (200' deed); thence South 54 degrees 21 minutes 25 seconds West, a distance of 201.87 feet to the northeasterly line of a tract previously conveyed to Manuel Aubuchon in Book 1054 on Page 211 in the St. Louis County, Missouri, Recorder's Office; thence North 37 degrees 12 minutes 21 seconds West, along said northeasterly line, a distance of 244.20 feet to the southeasterly right of way line of Taussig Road (as widened); thence North 54 degrees 30 minutes 21 seconds East, along said right of way line, a distance of 168.11 feet to the Point of Beginning and containing 1.11 acres.

PARCEL 2
50.93 ACRES

Part of U.S. Survey 131 in Townships 46 and 47 North, Range 5 East of the Fifth Principal Meridian, St. Louis County, Missouri, being more particularly described as follows:

Beginning at the most southern corner of a tract previously conveyed to Manuel Aubuchon in Book 1054 on Page 211 in the St. Louis County, Missouri, Recorder's Office; thence North 69 degrees 12 minutes 20 seconds East, along the southerly line of said tract, a distance of 731.58 feet to the westerly right of way line of U.S. Highway 40-61 (St. Charles Rock Road); thence North 0 degrees 39 minutes 39 seconds West, along said right of way line, a distance of 235.47 feet; thence continuing along said right of way line being a curve to the left having a radius of 1860.08 feet, a chord bearing North 5 degrees 28 minutes 20 seconds West, a chord distance of 312.04 feet to a point at the intersection of said right of way line with the northeasterly line of aforementioned Aubuchon tract; thence North 37 degrees 12 minutes 21 seconds West along said northeasterly line, a distance of 2104.78 feet to the centerline of Taussig Road; thence South 54 degrees 30 minutes 21 seconds West along said centerline, a distance of 487.90 feet; thence South 48 degrees 34 minutes 21 seconds West continuing along said centerline, a distance of 68.21 feet to the most northerly corner of tracts formerly conveyed to John Guerra and Wife, in Book 1597 on Page 78, and Book 1853 on Page 510 in the St. Louis County, Missouri, Recorder's Office; thence South 36 degrees 53 minutes 01 second East along the northeasterly line of said Guerra tracts, a distance of 486.26 feet to the most easterly corner of said Guerra tracts; thence South 53 degrees 06 minutes 24 seconds West along the southeasterly line of said Guerra tracts, a distance of 437.11 feet to the southwesterly line of aforementioned Aubuchon tract; thence South 36 degrees 53 minutes 01 second East along said southwesterly line, a distance of 1878.36 feet to the Point of Beginning and containing 50.93 acres.

10. Provide a list of all transporters (names, addresses, and EPA identification numbers) disposing of waste at the West Lake Landfill by year. If the waste was or is being disposed of pursuant to a written contract, provide a copy of any contracts or agreements.

Laidlaw objects to this Request since it calls for information outside the scope of the investigation as defined in the cited June 12, 1991 letter from Mr. Hoefer to Mr. Cottick. When Laidlaw purchased the stock of West Lake Landfill in July, 1988, it understood that the active landfill was properly lined and properly permitted. However, without waiving the objection, computer print-outs of transporters and their addresses are provided with this response for the following as-of dates: October 17, 1988, May 5, 1989, May, 1990, May, 1991. There are no EPA identification numbers because the wastes are all non-hazardous.

Also provided are copies of purchase orders and contracts.

11. Provide the names, addresses, and telephone numbers of all persons responsible for the financial recordkeeping for West Lake Landfill, past and present.

Those responsible for financial record-keeping for Laidlaw Waste Systems (Bridgeton), Inc. (formerly West Lake Landfill, Inc.) are as follows:

I. Regional and Corporate Personnel:

	PREVIOUS STAFF	CURRENT STAFF
REGION STAFF ACCOUNTANT	Lynn Draeger 1320 E. Algonquin #2C Schaumburg, IL 60173 (708) 397-0964	Deborah Ladecky 2340 S. Arlington Hgts. Rd. Arlington Heights, IL 600005 (708) 439-6686
REGION ACCOUNTING MANAGER	Lori Mandala (Deceased)	Mark Koch 2340 S. Arlington Hgts. Rd. Arlington Heights, IL 600005 (708) 439-6686
	Randy Rogers 1604 Pine Creek Way Woodstock, GA 30188 (404) 924-3377	
REGION CONTROLLER	Michael Hannon 2340 S. Arlington Hgts. Rd. Arlington Heights, IL 60005 (708) 439-6686	Michael Hannon Same
CORPORATE ACCOUNTING MANAGER	Ray Mudge 3221 N. Service Rd. Burlington, ON L7N 3G2 (416) 336-1800	Carol Sandwell 3221 N. Service Rd. Burlington, ON L7N3G2 (416) 336-1800
CORPORATE CONTROLLER	Richard Norris 3221 N. Service Rd. Burlington, ON L7N 3G2 (416) 336-1800	Richard Norris 3221 N. Service Rd. Burlington, ON L7N3G2 (416) 336-1800

II. Division Personnel:

	PREVIOUS STAFF	CURRENT STAFF
OFFICE COORDINATOR	Vicky L. Smith 2379 Cedar Dale Maryland Heights, MO 63043 (314) 469-1323 Jonathan Green 985 Jefferson Florissant, MO 63031 (314) 831-9138	Mary K. Green 13570 St. Charles Rock Rd. Bridgeton, MO 63044 (314) 739-1919
DIVISION CONTROLLER	Janet D. Meibaum 13570 St. Charles Rock Road Bridgeton, MO 63044 (314) 739-1919	Janet D. Meibaum 13570 St. Charles Rock Road Bridgeton, MO 63044 (314) 739-1919

12. Identify all persons directly involved in overseeing activities at the site, including employees who have knowledge, information or documents about the quarry and landfill operations.

The general manager has oversight responsibilities at Laidlaw Waste Systems (Bridgeton), Inc. for landfill operations.

Randy L. Anderson
13570 St. Charles Rock Road
Bridgeton, MO
(314) 739-1919

All employees would have some knowledge about the active landfill operations of the Company. However, based upon the modified definition of "the site," those individuals need not be listed at this time since the information appears to be outside the scope of the request.

13. Describe any clean-up or removal of hazardous substances as defined in CERCLA § 101(14); 42 U.S.C. § 9601(14), at the site.

None

14. Provide copies of boring logs, geologic reports, well logs, well locations, soil samples, and all sampling data including sampling locations of all such samples for the site.

Laidlaw objects to this Request to the extent it seeks information concerning the radioactively contaminated parcels of land which Laidlaw does not own and has never owned. Further, Laidlaw objects to this request because it exceeds the scope of the investigation as modified by the EPA in its June 12, 1991 letter from Mr. Hoefer to Mr. Cottick.

However, in the spirit of cooperation, this information will be provided with the response.

15. Provide a description of the method of waste disposal (e.g., whether the waste was compacted or crushed prior to disposal), the thickness of waste deposited, and the amount of clean cover on top of the waste.

Waste is compacted, bull-dozed until it rebounds the same amount as was depressed, and is covered with six inches of soil cover daily in the properly lined, properly permitted landfill operated by Laidlaw since late July, 1988.

Since the information sought appears to be outside the scope of the investigation as modified by the EPA in its June 12, 1991 letter from Mr. Hoefer to Mr. Cottick, no additional information will be provided, unless further requested.

16. Provide narrative and documentary information as to any waste West Lake Landfill has ever had transported offsite, including but not limited to copies of:

16.1 Shipping manifests;

16.2 Shipping logs;

16.3 Receipts;

16.4 Weight tickets; and/or

16.5 Permits.

None. The only material "transported" offsite would be leachate which is pumped out of the landfill into the lagoon, pretreated, and discharged through the pipeline into the Metropolitan Sewer District, pursuant to the City's NPDES permit.

17. Provide copies of any local, state or federal operating permits relating to waste production, storage, treatment or disposal at the site, including air, water, solid, or hazardous waste permits.

Copies are provided with this response under Tab 17.

18. Has the landfill ever been closed or shut down for any period of time? If so, provide the dates and circumstances under which the landfill was closed.

No, not to our knowledge.

19. Provide copies of the meeting minutes of the corporate directors' meetings, for all the years during which Respondent held an interest in or was affiliated with the site.

Laidlaw objects to this request for the reason it is overly broad and seeks information which has absolutely no relevancy to this proceeding. However, without waiving this objection, the corporate recordbook of Laidlaw Waste Management (Bridgeton), Inc. will be made available.

20. Do you have any knowledge of releases of hazardous wastes or hazardous constituents (see 40 C.F.R. Part 261, Appendix VIII) into the environment (air, surface water, groundwater, or soil) from the site at any time in the past or present? If yes, provide a complete description of each release, including but not limited to:

20.1 Location of release;

20.2 Waste or constituents released;

20.3 Quantities of release;

20.4 Date of release;

20.5 Cause of release;

20.6 Environmental impact of release;

20.7 Response actions taken; and

20.8 Measures taken to prevent the recurrence of release.

Response:

20.1 Monitoring Well F-2 (at property line).

20.2 Suspicion of volatile organics.

20.3 Unknown at this time; confirming and remedial investigation is on-going.

20.4 September 6, 1990.

20.5 Unknown.

20.6 Unknown; there are no known users of that aquifer.

20.7 Remedial investigation is on-going.

20.8 Remedial investigation is on-going.

Monitoring Well F-2 installed at the property line and initially analyzed in September, 1990 revealed indications of several organic compounds with odorous vapors similar to landfill gas emissions. Confirmatory testing also confirmed the presence of some PCB's, metals and chlorides. Sampling and analysis reports are provided with this response.

In addition, sampling and analysis have shown a small portion of low-level radioactive sediment. However, this is not a release from the site as owned by Laidlaw. Further, radionucleides are not listed as a hazardous waste or constituent under 40 C.F.R. Part 261, Appendix VIII.

21. Provide a detailed description of the area where radioactive materials were deposited at West Lake Landfill, including a legal description.

Laidlaw does not own, and never has owned, any of the parcels of land which were contaminated by radioactive materials. Any information Laidlaw has about these parcels will be made available, however.

See the red-hatched parcels on the blue areas on Attachment 2. The legal descriptions are as follows:

PARCEL 1

A tract of land in part of U.S. Survey 131, Township 47 North, Range 5 East of the 5th Principal Meridian, St. Louis County, Missouri, described as follows:

Commencing at the intersection of the northwesterly line, of U.S. Survey 131 and the southwesterly right of way line of Highway 40, also known as St. Charles Rock Road; thence South 43 degrees 53 minutes 31 seconds East, along said right of way line, a distance of 729.68 feet; thence South 40 degrees 49 minutes 32 seconds West, a distance of 92.54 feet to the Point of Beginning of the following described tract; thence continuing South 40 degrees 49 minutes 32 seconds West, a distance of 288.61 feet; thence south 89 degrees 29 minutes 50 seconds West, a distance of 241.41 feet; thence North 79 degrees 05 minutes 44 seconds West, a distance of 390.43 feet; thence North 29 degrees 48 minutes 55 seconds East, a distance of 499.73 feet; thence North 84 degrees 45 minutes 59 seconds East, a distance of 248.68 feet; thence South 32 degrees 24 minutes 17 seconds East, a distance of 201.28 feet; thence South 56 degrees 18 minutes 22 seconds East, a distance of 251.78 feet to the Point of Beginning and containing 6.29 Acres.

PARCEL 2

A tract of land in part of Lot 20, of the St. Charles Ferry Company Tract in U.S. Survey 47 and 1934 and in part of U.S. Survey 47 Township 47 North, Range 5 East of the 5th Principal Meridian, St. Louis County, Missouri, described as follows:

Commencing at the intersection of the centerline of St. Charles Rock Road and the northwesterly line of Lot 20 of the St. Charles Ferry Company Tract; thence North 28 degrees 53 minutes 11 seconds East, along said northwesterly line, a distance of 148.48 feet of the Point of Beginning of the following described tract; thence continuing North 28 degrees 53 minutes 11 seconds East, along said line, a distance of 676.08 feet to the northwest corner of said Lot 20; thence North 72 degrees 46 minutes 42 seconds West, along the northerly line of Lot 19 of the St. Charles Ferry Company tract, a distance of 674.79 feet; thence North 47 degrees 43 minutes 02 seconds East, a distance of 906.64 feet; thence South 64 degrees 46 minutes 52 seconds East, a distance of 389.58 feet; thence South 76 degrees 30 minutes 26 seconds East, a distance of 245.51 feet; thence South 60 degrees 07 minutes 01 seconds East, a distance of 283.36 feet; thence South 31 degrees 26 minutes 39 seconds West, a distance of 1136.42 feet; thence south 33 degrees 08 minutes 25 seconds West, a distance of 109.40 feet; thence South 34 degrees 54 minutes 38 seconds East, a distance of 149.81 feet; thence South 44 degrees 29 minutes 33 seconds West, a distance of 267.70 feet; thence North 78 degrees 25 minutes 41 seconds West, a distance of 241.02 feet; thence North 34 degrees 31 minutes 30 seconds West, a distance of 351.19 feet to the Point of Beginning and containing 28.09 Acres.

22. Describe in detail, the relationship between Respondent and the Cotter Corporation, regarding the disposal of hazardous substances at West Lake Landfill.

None. To the best of Laidlaw's knowledge, Cotter Corporation owned the radioactive contaminants which were dumped on the parcels of property which were described in answer to Request No. 21 in approximately 1973.

23. Provide information describing the location and amount of radioactive waste disposed at West Lake Landfill. Provide information about the ownership of the radioactive waste before its disposal at the landfill.

See answers to Requests 21 and 22 for location and information about ownership of the radioactive waste before its disposal.

Laidlaw does not own and has never owned the parcels of land upon which the radioactive contaminants were dumped. To the extent Laidlaw has any information, it will provide it. In addition, the following reports (which accompany this response) contain information regarding location, amount, ownership prior to disposal and the like:

1. Confirmed Abandoned or Uncontrolled Hazardous Waste Disposal Sites in Missouri, Fiscal Year 1987 Annual Report, Missouri Department of Natural Resources, Division of Environmental Quality;
2. Radiological Survey of the West Lake Landfill St. Louis County, Mo., May, 1982, U.S. Nuclear Regulatory Commission;
3. Radioactive Material in the West Lake Landfill, Summary Report, U.S. Nuclear Regulatory Commission, 1988;
4. NRC Report on Bridgeton Radioactive material, July, 1989;
5. Foth and Van Dyke survey, December 12, 1989;
6. Draft study proposal for West Lake Landfill prepared by U.S. Department of Interior.

Also made a part of this response are letters relating to the radioactive contaminants described above are letters from the NRC and MDNR.

24. With respect to all hazardous substances disposed at West Lake Landfill, provide the following information:

- 24.1 Time period(s) over which each substance was disposed;
- 24.2 Quantity (weight and volume) of each substance disposed;
- 24.3 Nature and condition of any containers in which these wastes were placed before disposal;
- 24.4 Company name, address, and telephone number of each entity (individual, facility, generator, and/or transporter) offering these substances for disposal; and
- 24.5 Results of any sample analyses performed on these wastes before disposal.

The Company operates a sanitary landfill and accepts no hazardous substances.

However, in addition to the U308 radiological waste dumped on the site in 1973, prior to 1981 some hazardous chemical wastes may have been disposed of before they were designated as "hazardous." Specifics are not known; however, copies of responses of transporters under § 103(c) of CERCLA (Notification of Hazardous Waste Site) are provided with this response.

Periodic water and air monitoring have shown no offsite migration nor groundwater contamination. (See response to Request No. 20).

Also provided are letters from the EPA and MDNR relating to disposal of non-contaminated materials from the Shenandoah Stables Superfund dioxin cleanup site.

25. Provide a list of all Federal, State and/or local permits with their respective numbers, contracts, licenses, or agreements which involved the disposal of hazardous substances and/or hazardous waste.

None.

26. Is Respondent covered by any type of liability insurance for sudden or non-sudden accidental releases of any hazardous substances or constituents or for any other liability resulting from your facility's handling of solvents, acids, metals or other hazardous substances? If so, please state:

26.1 The name and address of the insurer;

26.2 The number of the policy;

26.3 The effective dates of the policy;

26.4 The limits of liability; and

26.5 The name and address of the custodian of the policy.

Laidlaw is an international company with multiple insurers and insurance policies which have been and are in effect since the stock purchase of West Lake Landfill, Inc. If Laidlaw is ever adjudged responsible for liabilities arising from this proceeding, Laidlaw and its insurance carriers will determine whether specific insurance policies provide coverage for specific occurrences.

Notwithstanding the foregoing, copies of Certificates of Insurance for Laidlaw Waste Management, Inc. and Laidlaw Waste Management (Bridgeton), Inc. are provided with this response.

27. If you are unable to obtain or provide any of the above information, please indicate the names and addresses of those individuals and/or corporations who would possess such information.

The names and addresses of those who may be able to provide information which Laidlaw is unable to include:

West Lake Quarry and Material Company
12976 St. Charles Rock Road
Bridgeton, MO 63044
William E. Whitaker, President

West Lake Ready Mix Co.
12976 St. Charles Rock Road
Bridgeton, MO 63044

William McCulllough, Operations Manager
12976 St. Charles Rock Road
Bridgeton, MO 63044

John Basilco
United States Real Estate
Bridgeton, MO 63044
(314) 291-8900